

COHEN-JOHNSON, LLC

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6 **DISTRICT COURT**
7 **CLARK COUNTY, NEVADA**

8 LYNN R. HYMAS, an individual and
9 SUSAN HYMAS, an individual,

10 Plaintiffs,

11 vs.

12 DEUTSCHE BANK NATIONAL TRUST
13 COMPANY, AS TRUSTEE FOR MORGAN
14 STANLEY CAPITAL I INC. TRUST 2006-
15 NC2, a New York corporation; QUALITY
16 LOAN SERVICE CORPORATION, a
17 California corporation; NEW CENTURY
18 MORTGAGE CORPORATION, a California
19 corporation; DOES I through X, individuals
20 and ROES I through X, corporations,
21 inclusive;

22 Defendants.

Case No.: 2:13-cv-01869-RCJ-GWF

**STIPULATION AND JOINT
MOTION FOR EXTENSION OF
DEADLINE TO SUBMIT PROPOSED
PRETRIAL ORDER**

(Third Request)

19 IT IS HEREBY STIPULATED AND MOVED, by and between the parties, plaintiffs
20 Lynn R. Hymas and Susan Hymas (“Plaintiffs”), by and through their attorneys of record, the
21 law firm COHEN-JOHNSON, LLC, and defendant Deutsche Bank National Trust Company, as
22 Trustee for Morgan Stanley Capital I Inc. Trust 2006-NC2, (“Defendant”), by and through its
23 attorneys, the law firm SNELL & WILMER L.L.P., and Defendant Quality Loan Service
24 Corporation, by and through their attorneys of record, MCCARTHY & HOLTHUS, LLP, that
25 the deadline for the parties to submit a joint pretrial order under LR 16-3 and LR 16-4 be
26 extended from July 29, 2015 to August 31, 2015.
27
28

The parties stipulate and agree that good cause exists for the requested extension. Plaintiffs are desirous to explore and discuss alternative dispute resolutions or other means of resolving this case; as opposed to engaging using judicial resources or advancing pre-trial preparation, with its associated fees and costs. Defendants are likewise desirous to explore other means of resolution as opposed to preparing for trial.

Dated this 29th day of July, 2015.

COHEN|JOHNSON, LLC

/s/ H. Stan Johnson
H. STAN JOHNSON, ESQ.
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Attorneys for Plaintiffs

McCARTHY & HOLTHUS, LLP.

/s/ Gary S. Fink
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Attorney for Defendant Quality Loan Service Corporation

SNELL & WILMER, L.L.P.

/s/ Amy F. Sorenson
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*Attorney for Defendant Deutsche Bank
National Trust Company, as Trustee for
Morgan Stanley Capital I Trust 2006-NC2*

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ORDER

IT IS HEREBY ORDERED that a Status Conference is set for 10:00 A.M., Wednesday, September 9, 2015, in LAS VEGAS COURTROOM 4B, before Judge Robert C. Jones. IT IS SO ORDERED this 31st day of July, 2015.


UNITED STATES DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on July 29th, 2015, I electronically transmitted the foregoing
**STIPULATION AND JOINT MOTION FOR EXTENSION OF DEADLINE TO SUBMIT
PROPOSED PRETRIAL ORDER** to the Clerk's Office using the CM/ECF System for filing and
transmittal of a Notice of Electronic Filing to all counsel in this matter; all counsel being registered to
receive Electronic Filing.

/s/ C.J. Barnabi
An employee of Cohen-Johnson, LLC

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